## **REMARKS**

Careful consideration has been given by the applicants to the Examiner's comments and rejection of the claims, as set forth in the outstanding Office Action, and favorable reconsideration and allowance of the application, as amended, is earnestly solicited.

Applicants note the Examiner's rejection of Claims 1, 2. 4, 5, 9-12, 14, 19 and 20 as being unpatentable over Katchmar, U.S. Patent No. 6,392,890, previously cited, under 35 U.S. C. §103(a) in view of the Admitted Prior Art and Barber, et al., U.S. Patent No. 6,590,292, as previously cited and as detailed extensively in the Office Action.

Concerning the foregoing, applicants note the Examiner's extensive reasoning rejecting the claims, and apparently, the explanation in Webster's Collegiate Dictionary concerning the definitions of a proximity, of which applicants are well aware, being conversant and knowledgeable in the English language. In this connection, applicants fail to comprehend the Examiner's reference to the dictionary definitions, inasmuch as the claims are quite clear in their terminology in defining the inventive concept, and no clarification or explanation as to language and its meaning would appear to be warranted.

Moreover, applicants respectfully take issue with the Examiner's position in the application of the prior art comprising Katchmar in view of Barber, et al., asserting that this renders the present invention obvious to one skilled in the technology. In particular, applicants note with interest, the Examiner's repetitive comments that Katchmar "does not specifically disclose" the various aspects of the invention, as set forth in the present claims, and consequently, the Examiner seemingly appears to rely upon the secondary reference to Barber, et al. in combining this publication with Katchmar in allegedly rendering the present invention to be obvious. However, applicants note that the present invention is not directed

specifically to the materials of the chip and heat spreader and various components, as defined in Barber, et al., all of which are considered known in the technology. It is the particular novel aspect of the present invention in utilizing the small centrally located dot of an electrically conductive adhesive, which is surrounded by a large area of an electrically non-conductive adhesive to inhibit the danger of possible electrical short-circuiting, as explained in the specification and as set forth in the claims.

To the contrary, Barber, et al. does not in any manner concern itself with that particular type of structure or function, but merely discloses the normal materials employed to the attachment of a head spreader to a flip-chip integrated circuit structure. Those particular aspects are well known to the applicants and are not the subject matter of the invention, as disclosed, nor are those known aspects being claimed herein per se. It is the novel and highly advantageous aspect of utilizing the minute spot of electrically conductive adhesive encompassed by the large area of electrically non-conductive adhesive, which is the subject matter of the present invention, as clearly set forth in the claims. Contrary to the Examiner's position, Katchmar does not disclose those particular aspects, as seemingly also set forth in the Office Action, wherein the Examiner readily sets forth that Katchmar fails to disclose practically all of the elements of the present invention, as disclosed and claimed, with the exception of selections of material, as set forth in Barber, et al., and the latter of which is not the subject matter of the present invention.

Quite to the contrary, the prior art appears to teach <u>away</u> from the present invention, and the latter is not based on mere routine experimentation. The mere general statement made by Katchmar that there can be employed a combination of electrically conductive and

electrically non-conductive adhesives does not render the invention obvious to one of skill in this technology, inasmuch as Katchmar fails in any manner to disclose or suggest the novel ratio of the minute spot, which is approximately 1 millimeter in diameter of the electrically conductive adhesive, relative to the large area of an electrically non-conductive adhesive surrounding that particular spot. It remained for the present applicants to inventively utilize these particular features and ratios of the adhesives to derive the invention as set forth in the The mere general comments made in Katchmar, concerning which the claims herein. Examiner apparently clearly indicates that Katchmar fails to disclose all of these aspects and cites Barber, et al. as far as material aspects, have nothing in common with, nor do they anticipate or render obvious the present invention, which is derived on an actual utilization of such type of structure, as set forth in the claims. Consequently, applicants respectfully submit that the Examiner is reading into Katchmar and Barber, et al.'s various aspects and features, which are clearly not applicable to the invention and wherein the Examiner does admit that Katchmar fails to describe or disclose any of the significant inventive features, nor does the combination of Katchmar with Barber, et al., the latter of which has nothing to do with the particular types of adhesive employed herein, have any bearing on the invention, as set forth in the claims.

In view of the foregoing comments and amendments, which are deemed to clearly traverse the Examiner's ground of rejection, the application and claims are deemed to be in condition for allowance and the favorable reconsideration and issuance of the Notice of Allowance by the Examiner is earnestly solicited.

However, in the event that the Examiner has any queries concerning the instantly submitted Amendment, applicants' attorney respectfully requests that he be accorded the courtesy of possibly a telephone conference to discuss any matters in need of attention.

Respectfully submitted

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